

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

THOMAS H. KEELING,

Plaintiff,

v.

KRONICK, MOSKOVITZ, TIEDENMANN  
& GIRARD, P.C., *et al.*,

Defendants.

Civil Action No. JFM-00-133

\* \* \* \* \* 0000000 \* \* \* \* \*

**REQUEST THAT FREIDBERG LAW CORPORATION BE GRANTED LEAVE  
TO WITHDRAW AS COUNSEL FOR PLAINTIFF, AND PLAINTIFF'S CONSENT**

Pursuant to Local Rule 101.2(a), Plaintiff Thomas H. Keeling hereby requests that Freidberg Law Corporation be granted leave to withdraw as counsel of record in these proceedings, and further, Plaintiff voluntarily consents to that withdrawal. The Freidberg Law Corporation needs to withdraw because it is unwilling to represent Plaintiff in a lawsuit venued in, and to be tried in, a Maryland Federal Court. Plaintiff is therefore attempting to find new legal counsel to represent him in this matter. Plaintiff will continue *pro se* until such time as other counsel enters an appearance on his behalf.

Plaintiff's local counsel, Andrew D. Freeman and Brown, Goldstein & Levy, LLP, were retained for the sole purpose of acting as local counsel as required by Local Rule 101.1(b). Mr. Freeman was not retained to act as litigation counsel and has not agreed to do so. Mr. Freeman will remain as Plaintiff's counsel for the limited purpose of serving as local counsel as required by Local Rule 101.1 (b) should Plaintiff retain other California counsel. If Plaintiff is unable to retain other California counsel, Mr. Freeman will also withdraw his appearance.

*Thomas H. Keeling*  
6/14/00

*[Signature]*

WHEREFORE, Plaintiff respectfully requests that Freidberg Law Corporation, Edward Freidberg and Neal Pfeiffer be granted leave to withdraw as stated herein.

Dated: June \_\_\_\_, 2000

(attached)

Neal P. Pfeiffer  
Friedberg Law Corporation  
650 University Avenue, Suite 205  
Sacramento, California 95825  
(916) 929-9060  
Facsimile: (916) 929-9068

Dated: June 7, 2000

Andrew D. Freeman

Andrew D. Freeman, #03867  
Brown, Goldstein & Levy, LLP  
The Maryland Bar Center, Suite 300  
520 West Fayette Street  
Baltimore, Maryland 21201  
(410) 962-1030  
Facsimile: (410) 385-0869

Attorneys for Plaintiff

I HEREBY CONSENT TO THIS WITHDRAWAL.

Dated: June \_\_\_\_, 2000

(attached)

THOMAS H. KEELING  
Plaintiff *Pro Se*

WHEREFORE, Plaintiff respectfully requests that Freidberg Law Corporation, Edward  
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Dated: June \_\_\_\_, 2000

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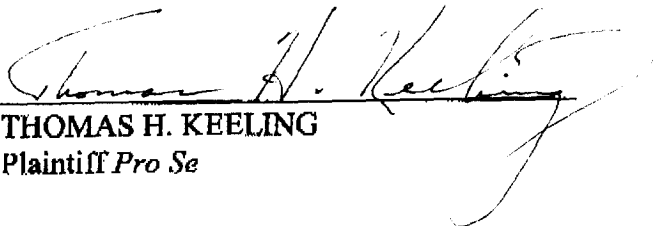
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Facsimile: (410) 385-0869

Attorneys for Plaintiff

I HEREBY CONSENT TO THIS WITHDRAWAL.

Dated: June 6, 2000




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THOMAS H. KEELING  
Plaintiff *Pro Se*

WHEREFORE, Plaintiff respectfully requests that Freidberg Law Corporation, Edward  
Freidberg and Neal Pfeiffer be granted leave to withdraw as stated herein.

Dated: June 6, 2000

  
\_\_\_\_\_  
Neal P. Pfeiffer  
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Attorneys for Plaintiff

I HEREBY CONSENT TO THIS WITHDRAWAL.

Dated: June 6, 2000

\_\_\_\_\_  
THOMAS H. KEELING  
Plaintiff *Pro Se*